

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

STACY L. RANDALL,

Plaintiff,

v.

Case No. 3:22-cv-00400-jdp

REED C. WIDEN, MICHAEL KIESLER,
WIDEN ENTERPRISES, LLC, and
WINDY WATERS, INC.,

Defendants.

PLAINTIFF’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME

Plaintiff Stacy L. Randall, through her undersigned counsel, respectfully moves the Court for a one-week extension of the deadline to file a response to Defendants’ Motion Challenging Plaintiff’s Confidential Designations Under the Protective Order (Dkt. 162), and states in support as follows:

1. One business day ago, Friday, March 15, 2024, Defendants filed a motion challenging certain of Plaintiff’s confidentiality designations under the protective order governing this case.
2. As evidenced by the face of the motion and opening paragraph of the brief in support thereof, the issues presented by Defendants’ motion are unusually complex and sensitive, requiring significant time and resources to respond to.
3. Moreover, many of the specific arguments presented to the Court are being raised for the first time and were never asserted as a basis for de-designation during the parties’ meet-and-confer.

4. Under the circumstances, Plaintiff requests one additional week to file her response to the motion and accordingly requests that such response be due Friday, March 29, 2024.

5. Plaintiff's counsel has consulted with Defendants' counsel, who does not oppose the requested extension.

WHEREFORE, Plaintiff respectfully requests that the Court extend the deadline to respond to Defendants' motion to March 29, 2024.

Dated this 18th day of March, 2024.

s/ Mark A. Cameli

Mark A. Cameli

WI State Bar ID No. 1012040

mcameli@reinhartlaw.com

David Palay

WI State Bar ID No. 1115862

dpalay@reinhartlaw.com

Monica A. Mark

WI State Bar ID No. 1082428

mmark@reinhartlaw.com

Jessica Hutson Polakowski

WI State Bar ID No. 1061368

jpolakowski@reinhartlaw.com

Samuel C. Sylvan

WI State Bar ID No. 1131339

ssylvan@reinhartlaw.com

Reinhart Boerner Van Deuren s.c.

1000 North Water Street, Suite 1700

Milwaukee, WI 53202

Telephone: 414-298-1000

Facsimile: 414-298-8097

Mailing Address:

P.O. Box 2965

Milwaukee, WI 53201-2965

Attorneys for Plaintiff